

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

LYNNE CALLIGARO,

Plaintiff,

v.

DELOITTE CONSULTING LLP,

Defendant.

Case 1:19-cv-01456-RDA-JFA

**CONSENT MOTION FOR LEAVE OF COURT TO MODIFY EXPERT DISCLOSURE
DEADLINE**

Pursuant to paragraph 5 of the Rule 16(B) Scheduling Order entered by this Court on June 18, 2020 (Docket no. 25), plaintiff Lynne Calligaro and defendant Deloitte Consulting LLP (together, the “parties”), by and through their counsel, jointly move for entry of the attached order modifying the date by which the parties must make expert disclosures, which is currently September 14, 2020. (*See* Docket no. 22 ¶ 4; Docket no. 25 ¶ 5).

The parties are in the process of exchanging written discovery, and defendant’s responses to plaintiff’s discovery requests are currently due on August 27, 2020. Given the volume of information requested by plaintiff, defendant has asked plaintiff for a two-week extension. Plaintiff has agreed to a two-week extension, but in doing so the parties will need an extension of the deadline for initial and rebuttal expert disclosures. Under the current scheduling order, expert disclosures are due on September 14, 2020, with rebuttal disclosures due 30 days thereafter. (*See id.*) In order to give plaintiff sufficient time to review defendant’s discovery responses before the deadline for serving her expert disclosures, the parties respectfully request that the deadline for such disclosures be extended by two weeks, until September 28, 2020, with

expert rebuttal disclosures due 30 days thereafter. The parties agree that good cause exists for the extension.

This is the parties' first motion for a modification of the Court's scheduling order, and the motion is made in good faith and not for the purpose of causing any undue delay. The parties agree that a hearing on this motion is waived.

Dated: August 24, 2020

Respectfully submitted,

/s/ Joshua H. Erlich

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